

GOLDEN GOODRICH LLP

David M. Goodrich, State Bar No. 208675

dgoodrich@go2.law

Anerio V. Altman, State Bar No. 228445

aaltman@go2.law

3070 Bristol Street, Suite 640

Costa Mesa, California 92626

Telephone: 714.966-1000

Facsimile: 714.966-1002

Attorneys for Defendants

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

The Litigation Practice Group P.C.,

Debtor.

Richard A. Marshack, Trustee of the LPG Liquidation
Trust,

Plaintiff,

v.

Oxford Knox, LLC, a Delaware limited liability
company; Buffalo 21 Partners, Inc., a Wyoming
corporation; Jason Dovalina, individually; Rachel
Dovalina, individually; Syed Faisal Gilani aka Sye
Gilani, individually; BAE Enterprises, Inc., a
Wyoming corporation; Samson Ly, individually;
BEW Solar Management, LLC, a California limited
liability company; Lexicon Consulting, LLC, a
Colorado Limited Liability Company; United
Partnerships, LLC, a Florida Limited Liability
Company; Ventura Consulting, LLC, a Nevada
limited liability company; Matthew Church,
individually; Frank Brown, individually; Validation,
LLC, a terminated California limited liability
company; Spectrum Payment Solutions, LLC, a
California limited liability company; Home Energy
Solutions, Inc., a California corporation; JNR
Services, Inc., a California corporation; C.A.T.
Exteriors, Inc., an Arizona corporation; AZLS
Enterprises, Inc, a California corporation; and
INVESTLINC Wealth Services, Inc., a California
corporation,

Defendants.

Chapter 11

Case No. 8:23-bk-10571-SC

Adv No. 8:25-ap-01208-SC

**AMENDED NOTICE OF HEARING ON
MOTION TO DISMISS COMPLAINT WITH
PREJUDICE AS TO CERTAIN DEFENDANTS
FOR FAILURE TO CORRECTLY NAME
DEFENDANTS**

F.R.B.P. 7012(b)(5)

F.R.B.P. 7012(b)(6)

JUDGE

Hon. Scott Clarkson

Hearing:

DATE: October 23, 2025

TIME: 10:00 a.m.

PLACE: Courtroom 5C/Via ZoomGov
411 West Fourth Street
Santa Ana, CA 92701

1 **TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY**
2 **JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, PLAINTIFF AND HIS**
3 **COUNSEL, AND ALL OTHER INTERESTED PARTIES:**

4 **PLEASE TAKE NOTICE** that on October 23, 2025, at 10:00 a.m., in Courtroom 5C of the
5 United States Bankruptcy Court located at 411 West Fourth Street, Santa Ana, California 92701,
6 newly added defendants Lexicon Consulting, LLC, a Colorado limited liability company
7 (“Lexicon”), United Partnerships, LLC, a Florida limited liability company (“U.P.”), and Ventura
8 Consulting, LLC, a Nevada limited liability company (“Ventura and with Lexicon and U.P.,
9 “Defendants”), will and hereby do move (dkt. 34, “Motion”) the Court for an order dismissing the
10 Second Amended Complaint filed August 13, 2025 as Docket #30 (“SAC”) by Richard A.
11 Marshack, Trustee of the LPG Liquidation Trust (“Plaintiff”), and the claims asserted therein,
12 pursuant to Federal Rule of Bankruptcy Procedure 7012(b)(6) for failure to state a claim upon which
13 relief can be granted. The Motion was previously noticed for October 1, 2025, at 1:00 p.m.

14 **PLEASE TAKE FURTHER NOTICE** that if you do not oppose the Motion, you need take
15 no further action. If you object to the Motion, pursuant to Rule 9013-1 of the Local Bankruptcy
16 Rules, any opposition must be filed with the Court no later than fourteen (14) days prior to the
17 hearing on the Motion and must be served upon counsel for Defendants and the Office of the United
18 States Trustee. Any failure to timely file and serve an opposition may result in a waiver of any such
19 opposition and the court may enter an order granting the Motion without further notice.

20 The Motion is on file at the Bankruptcy Court. A complete copy of the Motion will be
21 provided to any party in interest by contacting David M. Goodrich by e-mail at dgoodrich@go2.law
22 or by telephone at (714) 966-1000.

23 **PLEASE TAKE FURTHER NOTICE** that Judge Clarkson will conduct the hearing
24 remotely using ZoomGov. ZoomGov: Video and audio connection information for each hearing
25 will be provided on Judge Clarkson's publicly posted hearing calendar, which may be viewed online
26
27
28

1 at: <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>, and then selecting “Judge Clarkson” from
2 the tab on the left-hand side of the page.

3 Dated: August 20, 2025

GOLDEN GOODRICH LLP

4
5 By: /s/ David M. Goodrich
6 David M. Goodrich
7 Anerio V. Altman
8 Attorneys for Defendants
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

3070 Bristol St., Suite 640, Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): **AMENDED NOTICE OF HEARING ON MOTION TO DISMISS COMPLAINT WITH PREJUDICE AS TO CERTAIN DEFENDANTS FOR FAILURE TO CORRECTLY NAME DEFENDANTS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 20, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; bryn@lesliecohenlaw.com
David M Goodrich dgoodrich@go2.law, kadele@go2.law; dfitzgerald@go2.law; wggllp@ecf.courtdrive.com
Yosina M Lissebeck Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com; ayrton.celentino@dinsmore.com
Richard A Marshack (TR) pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
Tyler Powell tyler.powell@dinsmore.com, lydia.tharp@dinsmore.com; wendy.yones@dinsmore.com
United States Trustee (SA) ustregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **August 20, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
411 W. 4th St., Ste 5130/Ctrm 5C
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

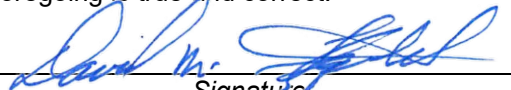
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 20, 2025

Date

David M. Fitzgerald

Printed Name


Signature